Supreme Court, U. S.
FILED
MAR 12 1980
MICHAEL RODAK, JR., CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 1979

No. 79-1415

THE COMMISSIONERS and THE MENTAL HEALTH/MENTAL RETARDATION ADMINISTRATORS FOR BUCKS, CHESTER, DELAWARE and MONTGOMERY COUNTIES, PENNSYLVANIA, *Petitioners*,

v.

TERRI LEE HALDERMAN, et al., *Respondents*.

PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Thomas M. Kittredge
Douglas B. Fox
2200 The Fidelity Building
123 South Broad Street
Philadelphia, Pennsylvania 19109
(215) 491-9636
Counsel for Petitioners

Of Counsel:
MORGAN, LEWIS & BOCKIUS

March 12, 1980

THE LEGAL INTELLIGENCER, 66 NORTH JUNIPER STREET, PHILA., PA. 19107 (215) 561-4050 55

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Other Authorities:

H.R. Rep. No. 94-58, 94th Cong., 1st Sess. 10 (1975), *reprinted in* 1975 U.S. Code Cong. & Ad. News 919 10,11

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v.

TERRI LEE HALDERMAN, et al., *Respondents*.

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Petitioners, who are the Commissioners and the Mental Health/Mental Retardation Administrators for Bucks, Chester, Delaware and Montgomery Counties, Pennsylvania, respectfully pray that a writ of certiorari issue to review the judgment and opinion of the United States Court of Appeals for the Third Circuit entered in this proceeding on December 13, 1979.

CITATION OF OPINION BELOW

The opinion of the Court of Appeals for the Third Circuit, not yet reported, appears in the Joint Appendix hereto. The opinion of the United States District Court for the Eastern District of Pennsylvania is reported at 446 F. Supp. 1295 (E.D. Pa. 1977), and appears in the Joint Appendix hereto.

JURISDICTION

The case was argued before a panel of the Court of Appeals for the Third Circuit on January 9, 1979. Reargument *en banc* took place on September 6, 1979, and the judgment of the Court of Appeals for the Third Circuit was entered on December 13, 1979. This petition for a writ of certiorari was filed within 90 days of the date judgment was entered by the Court of Appeals for the Third Circuit. Jurisdiction of this Court is invoked under 28 U.S.C. §1254(1).

QUESTIONS PRESENTED

1. Whether the Developmentally Disabled Assistance and Bill of Rights Act, 42 U.S.C. §6000 *et seq.*, imposes upon the states and their political subdivisions a duty to provide up to 6.75 million mentally retarded citizens with habilitative services in the least restrictive environment, without regard to economic feasibility or state and local public policy.

2. Whether a private right of action under the Developmentally Disabled Assistance and Bill of Rights Act may be implied, in view of the specific statutory remedy provided by Congress in the Act, and in view of the detrimental impact that an implied right of action would have upon state and local mental retardation programs.

3. Whether the court below committed clear and unmistakable error when it construed Pennsylvania's Mental Health and Mental Retardation Act of 1966, 50 P.S. §4101 *et seq.*, to impose duties upon the counties far in excess of those provided for by the Act.

4. Whether the district court impermissibly intruded into state and local affairs, and violated settled principles of federalism, by ordering wide-ranging injunctive relief that preempts state and local control over mental retardation services and by appointing a special master to restructure and oversee the mental retardation services in Southeastern Pennsylvania.

STATUTORY PROVISIONS INVOLVED

Rehabilitation Act of 1973, Section 504,
29 U.S.C. §794 . . . . . (197a)

Developmentally Disabled Assistance and Bill of Rights Act,
42 U.S.C. §6000 . . . . . (198a)
42 U.S.C. §6010 . . . . . (200a)
42 U.S.C. §6011 . . . . . (202a)
42 U.S.C. §6063 . . . . . (207a)

Mental Health and Mental Retardation Act of 1966,
50 P.S. §4301(d) . . . . . (227a)
50 P.S. §4509(5) . . . . . (228a)

STATEMENT OF THE CASE

On May 30, 1974, an action was commenced in the United States District Court for the Eastern District of Pennsylvania on behalf of Terri Lee Halderman, a re-

tarded citizen, by her mother and legal guardian, and on behalf of others similarly situated (respondents herein), against the Pennhurst State School and Hospital ("Pennhurst"), the Department of Public Welfare of the Commonwealth of Pennsylvania, and various officials of the Department of Public Welfare and staff of Pennhurst. The United States moved to intervene as a permissive party plaintiff, as did the Pennsylvania Association for Retarded Citizens ("PARC") (both are also respondents herein). Their motions to intervene were granted.

Respondents' Complaints, as amended, asserted claims against the Commissioners and Mental Health/Mental Retardation Administrators of Bucks, Chester, Delaware and Montgomery Counties (petitioners herein). Respondents alleged violations of various rights of Pennhurst residents arising under the Eighth and Fourteenth Amendments to the Constitution of the United States, §504 of the Rehabilitation Act of 1973, 29 U.S.C. §794, the Developmentally Disabled Assistance and Bill of Rights Act, 42 U.S.C. §6000 *et seq.*, and the Mental Health and Mental Retardation Act of 1966, 50 P.S. §4101 *et seq.* Respondents sought to close Pennhurst, to have all residents transferred to Community Living Arrangements ("CLA's") (community-based residential care and treatment centers), and to establish the right of all retarded citizens to habilitation in the least restrictive setting.

The district court issued its opinion on December 23, 1977, holding (a) that the due process clause of the Fourteenth Amendment, and the Pennsylvania Mental Health and Mental Retardation Act of 1966, guarantee the mentally retarded a right to care and treatment in the least restrictive environment sufficient to provide them with "skills necessary to cope as effectively as their capacities permit" (57a); (b) that such care and treatment cannot be provided in an institution such as Pennhurst (67a); (c) that the mentally retarded in

Pennhurst are being denied equal protection of the law by their continued residency there (68a), and that their continued residency constitutes discriminatory treatment in violation of section 504 of the Rehabilitation Act of 1973 (70a); and (d) that petitioners were statutorily responsible for guaranteeing the rights of the mentally retarded. (70a)

The district court also ordered wide-ranging injunctive relief against petitioners and the Commonwealth of Pennsylvania on March 17, 1978. In part, the order required:

> 1. Petitioners are permanently enjoined to provide "suitable community living arrangements and all necessary support services" to all residents of Pennhurst and to all mentally retarded citizens on Pennhurst's waiting list. (79a).
>
> 2. Petitioners are permanently enjoined to "provide all necessary and proper monitoring mechanisms" to assure the maintained quality of the CLA's. (80a)
>
> 3. Petitioners are ordered to "make available to the [special master appointed by the district court] "all professional and other resources" of the mental health facilities in the Commonwealth of Pennsylvania. (81a)
>
> 4. Jurisdiction is retained by the district court "until further order." (88a).

An appeal from the decision and order of the district court was noticed, and argument before a panel of the Court of Appeals for the Third Circuit (Chief Judge Collins J. Seitz, and Judges John J. Gibbons and A. Leon Higginbotham, Jr.) took place on January 9, 1979. Unable to agree on a decision (98a), the court scheduled rehearing *en banc* for September 6, 1979. The opinion of the court, per Judge Gibbons, was filed on December 13,

1979, with Chief Judge Seitz, and Judges Aldisert and Hunter, dissenting. The court approved almost all of the injunctive relief ordered by the district court, with the primary exception that it modified the district court's injunction in order to permit Pennhurst to remain open. (161a) The court below did not, however, follow the reasoning of the district court to reach its result, relying instead on establishing petitioners' liability under the Developmentally Disabled Assistance and Bill of Rights Act, a statute not even mentioned by the district court in reaching its holding. Further, the court below found that there is an implied private right of action under the Developmentally Disabled Assistance and Bill of Rights Act (114a), and that such an action may be maintained in federal court. (122a)

Since the order of the district court was entered on March 17, 1978, in which the district court retained jurisdiction over this case, the district court has entered no fewer than eight supplemental orders, some of which specifically enjoin petitioners to structure mental retardation programs as they have been formulated by the special master in conjunction with the district court.

REASONS FOR GRANTING THE WRIT

1. The Decision Of The Court Below Raises Significant And Novel Questions, Not Heretofore Addressed By This Court, With Regard To The Construction Of Federal Statutes Intended To Aid The Mentally Retarded.

A. The court below erroneously held that the Developmentally Disabled Assistance and Bill of Rights Act, 42 U.S.C. §6000 *et seq.*, has vested, in each of the 6.75 million retarded citizens of the United States, a right to habilitation in the least restrictive environment.

Judge Gibbons, writing for the court below, found that the Developmentally Disabled Assistance and Bill of Rights Act, 42 U.S.C. §6000 *et seq.* ("DD Act"), vests in all mentally retarded persons a federal statutory right to habilitation[1] in the least restrictive environment. The court held that this right is guaranteed by the DD Act, without regard to the amount of funding received by each state or county under the DD Act, without regard to each state or county's ability to raise funds for programs for the mentally retarded, and without regard to each state or county's public policy with regard to treatment of the mentally retarded.

This decision has staggering implications for state and local governments. The court below has transformed a modest funding statute,[2] intended only to encourage states to improve their mental retardation programs, into a federally-mandated program of treatment for the mentally retarded calling for the creation of new

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1. The court defined habilitation as "that education, training and care required by retarded individuals to reach their maximum development." (109a)

2. The entire federal allotment for the fiscal year ending September 30, 1980 is $65,000,000. 42 U.S.C. §6061.

and expensive facilities, and the hiring of additional personnel. There are approximately 6.75 million mentally retarded citizens in the United States today.[3] In 1976, over 150,000 mentally retarded citizens resided in public institutions like Pennhurst. (13a) The decision of the court below would appear to apply to every institution in every state that accepts funding under the DD Act.[4] In terms of cost alone, the decision of the court below may well force some states and counties to the verge of insolvency.[5]

In reaching its result, the court below acted in disregard of the provisions and the purpose of the DD Act.

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3. The incidence of mental retardation is about 3% in the general population. (10a)

4. The court below specifically reserved the question of whether its holding applies to states that do not accept federal funds under the DD Act. (118a)

5. The court below asserted that its decision would have little financial impact on the states and counties, relying on the trial court finding that the per patient cost in CLA's is less than the per patient cost at Pennhurst. (44a) However, the court below failed to take into consideration the large planning, construction, and implementation costs that its decision will engender. When these costs are considered, the court's decision will almost certainly be a considerable financial burden to many of the states and counties that have chosen to accept federal funding under the DD Act. Moreover, the holding of the court below goes far beyond merely requiring the closure of state institutions and the movement of 150,000 current residents into new community-based facilities. It establishes a right in 6.75 million retarded citizens to receive habilitative services in the least restrictive setting. Only a tiny fraction of this number is currently being served, at public expense, in community-based facilities. The remainder are being cared for by family or friends, or have been placed in privately licensed facilities or institutions (often at considerable financial sacrifice to their families), or are managing, with varying degrees of success, on their own. There is no way to determine how many of those not receiving publicly financed services will now demand them, as their right, but even if it is only a relatively small fraction the fiscal impact on state and local governments will be immense.

Further, by citing selectively from the DD Act's legislative history, the court below portrayed the legislative history in a manner that is unsupportable when the entire legislative history of the DD Act is fairly read.[6]

Although the court below decided that the mentally retarded have a right to habilitation under the DD Act, the source of any such right cannot be the DD Act itself. The DD Act is a funding statute, enacted pursuant to Congress's spending power, and was not intended to create substantive rights. The DD Act simply provides a financial "carrot" to states to improve their facilities for the mentally retarded. *United States v. Solomon*, 419 F. Supp. 358, 370 (D. Md. 1976), *aff'd*, 563 F.2d 1121 (4th Cir. 1977). It is true that states that choose to accept federal funding under the DD Act must comply with certain statutory conditions.[7] None of the specific statutory pro-

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6. Although the decision of the court below states that the parties supplied the court with "detailed briefings" on the construction of the DD Act (109a), this issue was never fully presented to the court. The district court did not rely on the DD Act for its holding, and the original briefs of the parties on appeal did not argue the point. After the court of appeals panel was unable to agree on a basis for its decision, reargument was scheduled for the court *en banc* and supplemental briefs were filed by the parties. Even then, however, the applicability of the DD Act was not extensively briefed by the parties. The supplemental brief for the United States did not even argue that the DD Act provides a distinct ground for relief, saying only that the district court's decision was "in accord with the objective" of the DD Act. Supplemental Brief for the United States, p.10.

7. 42 U.S.C. §6009 (states must submit a plan to evaluate services provided to "persons . . . through programs assisted under this chapter"); 42 U.S.C. §6011 (states must assure Secretary of HEW that "each program . . . which receives funds" under the Act provides a habilitation plan to persons receiving services under such program); 42 U.S.C. §6012 (states must provide a system to advocate the rights of the developmentally disabled); 42 U.S.C. §6063 (states must submit a state plan fulfilling requirements of that section).

Statutory provisions which mandate that certain conditions must be complied with in order to obtain federal funding should not be construed to give rise to substantive rights. *See Rogers v. Frito-Lay, Inc.*, No. 77-2443 (5th Cir., February 15, 1980).

visions setting forth the conditions with which states must comply, however, mandates that states and their political subdivisions accepting the limited funding provided by the DD Act must provide habilitative services to all mentally retarded persons, whether or not those persons are enrolled in a program receiving federal funds under the DD Act. Nor can a general right to habilitation be discerned either from the DD Act itself or from its legislative history. The court below erred when it held that such a right exists.

The court below further erred when it held that the DD Act mandates that all habilitation of mentally retarded persons must take place in the least restrictive environment. While the DD Act provides some financial incentive for deinstitutionalization and thus indicates a congressional preference for community-based services, the DD Act does not mandate that all habilitative services to the mentally retarded take place in the least restrictive environment. 42 U.S.C. §6010, primarily relied upon by the court below for its holding, is merely declarative of the congressional policy favoring deinstitutionalization, and cannot be construed to impose on the states and counties an obligation to provide all habilitation in the least restrictive environment, regardless of cost, feasibility or local policy to the contrary. In so holding, the court below disregarded the well-settled principle of statutory interpretation that congressional findings, incorporated into a statute, are merely declarative of congressional purpose and do not give rise to substantive rights. *See Association of American Railroads v. Costle*, 562 F.2d 1310 (D.C. Cir. 1977).

The legislative history of the DD Act indicates that deinstitutionalization is merely one goal of the DD Act, and is not a mandatory duty. The House Report to the DD Act, H.R. Rep. No. 94-58, 94th Cong., 1st Sess. 10 (1975), states that:

> [T]he Committee has chosen to include a specific requirement that state programs plan for as much

> deinstitutionalization *as is feasible*, and earmark monies for this purpose. Knowing that this may require some increase in expenditures, the Committee has also increased the authorizations of appropriations.
>
> It is anticipated that these requirements will prompt some movement of patients from State institutions back into their communities. (Emphasis added.)

1975 U.S. Code Cong. & Ad. News 928. That same report states that the purpose of the federal funding is to permit "deinstitutionalizing as many of those with developmental disabilities as is possible." *Id.* at 933. As Chief Judge Seitz noted in his dissent:

> I do not believe, especially with a funding statute such as the one here, that general findings and declarations should be used as a charter for the creation of absolute obligations where Congress felt the states should be free to choose on their own as to the proper allocation of funds. *Cf. Beal v. Doe*, 432 U.S. 438 (1977) (Title XIX gives states latitude as to whether to spend federal funds on abortion). In sum, where Congress establishes a funding scheme designed to encourage a course of conduct, that is no license to federal courts to make that conduct mandatory. (168a)

Thus, the court below construed the DD Act in a manner inconsistent with the DD Act's language, purpose and legislative history. Review by this Court is necessary to correct the error below, and to provide an authoritative construction of the DD Act, so that the states and their political subdivisions will have some guidance as to whether they may structure their programs for treatment of the mentally retarded with due regard to their own fiscal resources, public policy, and competing priorities.

B. The court below erroneously held that there is an implied private right of action under the Developmentally Disabled Assistance and Bill of Rights Act, and that such an action may be maintained in federal court, issues not heretofore addressed by this Court.

The court below concluded that an implied private right of action exists under the DD Act, and that this implied private right of action may be maintained in federal court. (121a) This Court has not yet had occasion to decide whether a private action may be maintained under the DD Act.[8]

This Court has expressed reluctance to imply a private right of action where Congress has not specifically provided for such a right. *See Touche Ross & Co. v. Redington*, 442 U.S. 560 (1979). Under the ruling of the court below, each resident of Pennhurst and each resident of similar institutions for the mentally retarded has recourse to the federal courts to redress alleged violations of the DD Act. If each plaintiff in such a suit could obtain wide-ranging relief similar to that ordered by the district court in this case, under penalty of contempt, the states' and counties' mental retardation programs would most certainly be in chaos due to conflicting judgments and uncertainty as to the future.

It is unimaginable that Congress could have intended that the DD Act, a modest funding statute, should give rise to private enforcement actions. Before such a result is permitted by this Court, congressional intent to provide a private right of action should be unmistakable. Such an intent is simply not shown here.

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8. In *Southeastern Community College v. Davis*, 442 U.S. 397 (1979), this Court declined to decide whether there is an implied private right of action under section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §794, another statute designed to aid the handicapped.

In part, the court below decided that an implied private right of action exists under the DD Act because of what it saw as a "dichotomy" in 42 U.S.C. §6010. First, 42 U.S.C. §6010 declares a "right to appropriate treatment." Then, that same section declares that federal funds are available "only to programs that meet certain basic minimum standards." This "dichotomy," the court stated, demonstrates that denial of funds is not the only mechanism Congress intended to enforce the rights declared in the statute. (114a) The court's reasoning is, at best, circular, for there would be no "dichotomy" at all if the court had not decided, wrongly, that 42 U.S.C. §6010 declares any substantive rights at all.

Further, if Congress had intended a second remedy for violations of the DD Act, it would have spoken as clearly as it did when it expressly provided that funds are to be terminated to states that do not comply with the provisions of the DD Act. 42 U.S.C. §6065. This Court has noted that "where a statute expressly provides a particular remedy, or remedies, a court must be chary of reading others into it." *Transamerica Mortgage Advisors, Inc. v. Lewis*, 100 S.Ct. 242, 247 (1979). In addition, 42 U.S.C. §6065 provides that complete termination of funds is not the only option available to the Secretary of HEW. The Secretary may "limit further payment . . . to such state to activities in which there is no such failure [to comply]." Thus, the Secretary has at his command a graduated enforcement mechanism which is completely compatible with the nature of a funding statute. The court below erred when it fashioned its own remedy to enforce the DD Act.[9]

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9. The court below found an implied right of action by applying the factors set forth by this Court in *Cort v. Ash*, 422 U.S. 66 (1975). In its discussion, the court below suggested that the DD Act was enacted pursuant to Section 5 of the Fourteenth Amendment, and not pursuant to Congress' spending power. (117a) This suggestion is completely unsupported by the legislative history of the DD Act. Further, such a holding would raise serious constitutional questions. *Cf. Oregon v. Mitchell*, 400 U.S. 112 (1970).

By implying a private right of action maintainable in the federal courts, the court below has placed itself in conflict with the decision of the Court of Appeals for the Fourth Circuit in *United States v. Solomon*, 563 F.2d 1121 (4th Cir. 1977), where the court held that a private action under the DD Act was maintainable, if at all, in state court only:

> The language in the conference committee report referring to the right to resort to a judicial forum for the protection of the right to treatment manifestly refers to a state judicial forum and not to a federal judicial forum where the United States customarily sues. 563 F.2d at 1125.

Thus, this Court should accept review of this case in order to decide, first, whether there is an implied private right of action under the DD Act, and second, if there is an implied private right of action, whether that action may be maintained in federal court.

C. The court below clearly and unmistakably misconstrued Pennsylvania law in holding that the Mental Health and Mental Retardation Act of 1966, 50 P.S. §4101 *et seq.*, mandates that the counties provide habilitative services.

The court below held that the counties of the Commonwealth of Pennsylvania have a statutory obligation under the Mental Health and Mental Retardation Act of 1966, 50 P.S. §4101 *et seq.* ("MH/MR Act"), to provide habilitative services to the mentally retarded. In so holding, the court ignored the provision of the MH/MR Act which limits the duties of the counties to those expressly set forth in section 301(d) of the MH/MR Act, which duties are "|s|ubject to the provisions" of section 509(5) of the MH/MR Act, which provides:

> In the event that sufficient funds to pay the full amount of the grants to which the counties may be entitled under the provisions of this section have not

> been appropriated, [the Department of Public Welfare shall] distribute State funds among the counties by a formula reasonably designed to achieve the objectives of this act, provided, however, that in such event the counties' financial obligations under this act shall be reduced in accordance with the same formula and *the counties shall be required to provide only those services for which sufficient funds are available.* (Emphasis added.)

Despite this explicit statutory directive that conditions the level of county services on the level of funding received from the Commonwealth, the court below held that petitioners were as responsible as the Commonwealth for providing habilitative services.

While petitioners recognize that this Court is hesitant to review the determination of state law questions by the courts of appeals, *see Huddleston v. Dwyer*, 322 U.S. 232 (1944), the court below committed clear and unmistakable error in its application of state law. This Court should therefore accept review of the decision of the court below. *Cf. Stoner v. New York Life Ins. Co.*, 311 U.S. 464 (1940).

2. The Decision Of The Court Below, If Uncorrected, Will Require Massive Federal Court Intervention Into The States' And Counties' Policy Determinations Regarding The Nature, Structure, Fiscal Feasibility, And Even Locations, Of Services To The Mentally Retarded, And Therefore Raises Important Issues Of Federalism.

This Court has already had occasion to express its strong disapproval of federal court intervention into the affairs of state-run institutions. *See Bell v. Wolfish*, 441 U.S. 520 (1979); *Rizzo v. Goode*, 423 U.S. 362 (1976). The reasoning implicit in those recent pronouncements has equal application here. The court below has ordered that the Commonwealth of Pennsylvania and its counties pursue one method of treatment of the mentally re-

tarded, to the exclusion of all other alternatives. In so holding, the court below has preempted state and local control of their own institutions and programs, in violation of these settled principles of federalism.

Petitioners do not argue that the deinstitutionalization ordered by the district court, as affirmed by the court of appeals, is not, in general, a desirable policy. The issue is far broader than the correctness of the mental retardation services policy embraced by the court below; the issue is whether the federal courts, rather than the states and their counties, should be making medical, legislative, and fiscal decisions concerning how best to care for their mentally retarded citizens. Under the decision below, it is the federal courts which will ultimately determine what habilitative services are required for each retarded citizen's "maximum development," what that "maximum" is, and what constitutes the "least restriction setting" for such habilitation.[10] The policy-making prerogatives of state and local governments in these areas have been eliminated.

The district court has retained jurisdiction of this case in order to implement its decision. (88a) Since the decision of the district court was rendered on December 23, 1977, the district court has issued no less than eight supplemental orders,[11] some of which enjoin the peti-

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10. Judge Gibbons found that the district court "did not adequately canvass the discreet needs of *individual* patients" (156a) in reaching the "wholesale judgment" that Pennhurst was unfit, and could not be made fit, for all retarded persons. He therefore ordered that, on remand, the district court or the master canvass "the special needs and desires of individual patients.". (159a) Judge Gibbons further cautioned that the trial court and the master should ensure that "the sanitary, staffings, and program deficiencies which were found at Pennhurst are not duplicated on a smaller scale in the CLA's". (161a) Lastly, Judge Gibbons ordered: "No matter how it is accomplished, however, an assessment of each class member's needs must be carried out." (162a)

11. Orders of the district court of March 17, 1978; October 16, 1978; March 5, 1979; April 26, 1979; May 29, 1979; June 8, 1979; February 22, 1980; and February 25, 1980.

tioners and the Commonwealth of Pennsylvania to undertake elaborate and detailed programs devised by the special master and by the court. The special master was appointed by the district court to oversee its injunctive relief, and that special master is still functioning, over two years later. It is not beyond the realm of possibility that the special master may eventually become a permanent adjunct to the district court, continually overseeing the care of the mentally retarded in Southeastern Pennsylvania.

The district court's orders are as intrusive into the fiscal affairs of the Commonwealth and its counties as they are intrusive into the ability of the Commonwealth and its counties to run their own mental retardation programs. The district court's order requires that the Commonwealth and the counties:

> [s]hall make available to the master all professional and other resources of the Department of Public Welfare, the Pennhurst State School and Hospital, the County Offices of Mental Retardation and the Base Service Units as may be necessary to execute this Court's Orders. (81a)

The district court and the court of appeals have completely preempted state and county regulation of treatment and care of their mentally retarded citizens. Further, by ordering that the Commonwealth and its counties make virtually all of their resources available to the special master to implement the district court's orders, the courts below have dictated a set of social priorities to the Commonwealth and its counties, completely bypassing their political processes. Such an intrusion by the federal judiciary into the mental retardation programs of the state and its counties ought not to be permitted; thus, this Court should grant review of this case.

CONCLUSION

For all of the foregoing reasons, this Honorable Court should issue a writ of certiorari to review the judgment and opinion of the Court of Appeals for the Third Circuit.

Respectfully submitted,

Thomas M. Kittredge
Douglas B. Fox
2200 The Fidelity Building
123 South Broad Street
Philadelphia, Pennsylvania 19109
(215) 491-9636
Counsel for Petitioners

Of Counsel:
MORGAN, LEWIS & BOCKIUS
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